

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION**

**JANET DAVIS, ANGEL RANDALL,
MELISSA SCHALLER, MANDY
PHELAN, individually and on behalf of
all others similarly situated,**

Plaintiffs,

v.

**GEICO CASUALTY COMPANY,
a foreign corporation, GEICO
ADVANTAGE INSURANCE
COMPANY, a foreign corporation, and
GEICO CHOICE INSURANCE
COMPANY, a foreign corporation, and
GEICO GENERAL INSURANCE
COMPANY, a foreign corporation,**

Defendants.

CASE NO.: 2:19-cv-02477-GCS-EPD

(JURY TRIAL DEMANDED)

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE
TO FILE SECOND AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Janet Davis, Angel Randall, Melissa Schaller, and Mandy Phelan (collectively, the “Plaintiffs”), on behalf of themselves and all others similarly situated, file, pursuant to Fed. R. Civ. P. 15(a), this Unopposed Motion for Leave to File Second Amended Class Action Complaint. The proposed Second Amended Complaint is attached hereto as Exhibit 1, and seeks to add the claims of new plaintiff Trey Roberts, individually and on behalf of a putative class, against new defendant GEICO Secure Insurance Company (“GEICO Secure”). The grounds for this Motion are fully set forth in Plaintiffs’ Memorandum of Law in Support of Unopposed Motion for Leave to File Second Amended Class Action Complaint.

Dated: February 21, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, February 21, 2020, I electronically filed the foregoing document via this Court's CM/ECF filing system, which will provide electronic notice to all counsel of record.

/s/ Jacob Phillips